

**KNOX
McLAUGHLIN
GORNALL
& SENNETT**

Attorneys & Counselors

120 West Tenth Street
Erie, Pennsylvania 16501-1461
814-459-2800
814-453-4530 (fax)
www.kmgslaw.com

Timothy M. Zieziula
814-459-9886 Ext. 303
tzieziula@kmgslaw.com

RECEIVED JUN 19 2012 *gd*

June 15, 2012

Marsha Adams
U.S. Environmental Protection Agency
Enforcement Services Section 1, SE-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



RE: Titusville Area School District
Response to EPA's Request for Information
Texas Township Drum Site in Kalamazoo, Michigan

Dear Ms. Adams:

Enclosed with this letter is the Titusville Area School District's response to the EPA's Request for Information in the above-referenced matter. Kindly direct all future correspondence regarding this matter to the attention of the undersigned. Thank you very much.

Very truly yours,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

By: 

Timothy M. Zieziula

TMZ:lah
Enclosures
1144572.v1

cc: Ms. Karen Jez, Superintendent, Titusville Area School District (w/ encl.)
Steven Kaiser, Esquire (via email with enclosures) kaiser.steven@epamail.epa.gov

TITUSVILLE AREA SCHOOL DISTRICT'S ("TASD")
RESPONSE TO REQUEST FOR INFORMATION

- i. Identify all persons consulted in the preparation of the answers to these Information Requests.

Response: Karen Jez, Superintendent; Ken Winger, retired former Superintendent; Richard Carr, retired former Superintendent; Diane Tanner, retired former Business Manager; Tim Harger, retired former Buildings and Grounds Director (and current School Board member).

- ii. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

Response: All School District Board minutes and relevant administrative files.

- iii. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response: Not applicable.

- iv. Did you ever enter into an oral or written contract or otherwise do business with either Chemical Assistance, Inc., Environmental Network, Inc., or Donald Haugen for the purpose of arranging for the storage, treatment or disposal of waste materials?

Response: Yes.

If you did, please identify the following:

- (a) The persons with whom you or such other persons made such arrangements;

Response:

Beverly Lorenzo, Customer Relations Associate,
Chemical Assistance, Inc.
Lisa M. Fookes, Customer Relations Manager,
Chemical Assistance, Inc.

- (b) The contact information for each person with whom such arrangements were made;

Response: 3157 Packard, Suite A
Ann Arbor, MI 48108
(800) 535-6650

(c) Every date on which such arrangements took place;

Response: July 3, 1991

(d) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;

Response: The nature of the waste material is generally described in the Bill of Lading dated August 19, 1991 enclosed with this Response. The source of the waste material was the school laboratory owned by TASD and used for the education of its students.

(e) The owner of the waste materials or hazardous substances so accepted or transported;

Response: TASD.

(f) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;

Response: The only information related to the quantity of waste materials is set forth on the August 19, 1991 Bill of Lading.

(g) All tests, analyses and analytical results concerning the waste materials;

Response: TASD does not have in its possession any tests, analyses or analytical results concerning the waste materials.

(h) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;

Response: TASD did not select the Site.

(i) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;

Response: It is believed by TASD that it paid \$2,700 to Chemical Assistance, Inc. for their waste removal services.

(j) Where the person identified in g. above intended to have such hazardous substances or waste materials transported and all evidence of this intent;

Response: Based upon the consignment information in the Bill of Lading and based further upon literature received from Chemical Assistance, Inc., prior to entering into a business relationship with Chemical Assistance, Inc., it is believed and therefore averred that

Mr. Richard Tanner, former Building and Grounds Director (deceased), believed that the waste material would be shipped to a disposal facility owned by Environmental Network, Inc. in Rossford, Ohio. The address of this facility is 63 Dixie Highway, Rossford, OH 43460.

(k) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

Response: TASD does not have any knowledge or information responsive to this request.

(l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;

Response: TASD does not have any knowledge or information responsive to this request.

(m) The measures taken by you to determine the actual methods, means and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;

Response: The response to (m) is based upon a review of the file material. It is believed and therefore averred that prior to entering into a business relationship with Chemical Assistance, Inc., Mr. Richard Tanner performed all necessary due diligence to insure that the waste material would be properly handled in accordance with all applicable federal and state laws. Chemical Assistance, Inc. held itself out as a firm specializing in the packaging and removal of laboratory chemicals and laboratory waste material from school districts. Mr. Tanner requested and received a description of the services to be provided by Chemical Assistance, Inc., a description of the various disposal facilities utilized by Chemical Assistance, Inc. and proof of insurance carried by Chemical Assistance, Inc. This information is included in the documents attached to this response.

(n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;

Response: TASD has no knowledge or information responsive to this request other than the information set forth on the Bill of Lading referenced in earlier Responses and enclosed with this Response.

(o) The price paid for (i) transport or (ii) disposal of (iii) or both, of each waste material and hazardous substance;

Response: See Response to Request (i).

(p) All documents containing information responsive to a)-p) above, or in lieu of identification of all relevant documents, provide copies of all such documents;

Response:

1. Letter from Beverly Lorenzo dated July 3, 1991;
2. Documents received by Mr. Tanner from Chemical Assistance, Inc. describing its services and insurance coverage;
3. Fax transmittal form dated July 3, 1991 and attached letter from Mr. Richard Tanner dated July 3, 1991;
4. Letter from Lisa Fookes dated July 3, 1991;
5. Bill of Lading dated August 19, 1991; and
6. Letter from Jody Smith dated February 3, 1994 and attached literature from "Chemical Consulting Network, Inc."

(q) All persons with knowledge, information or documents responsive to questions (a) through (p), above.

Response: See response to (i) above.

1144931.v1



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

July 3, 1991

Mr. Dick Tanner
Supervisor
Buildings and Grounds
Titusville Area School District
221 North Washington Street
Titusville, PA 16354

Dear Mr. Tanner;

Thank-you for taking the time to talk with me today. As requested I have enclosed information for your review.

Our firm, **Chemical Assistance, Inc.**, specializes in the packaging and removal of laboratory chemicals and laboratory waste. Chemical Assistance, Inc., will provide Titusville Area School District with the most comprehensive, cost-effective and environmentally secure approach to your material removal needs.

Chemical Assistance, Inc., will provide final disposition for all of your unwanted laboratory chemicals through our network of Reclamation, Reuse and Resale options. Laboratory waste will be treated by licensed and insured disposal facilities.

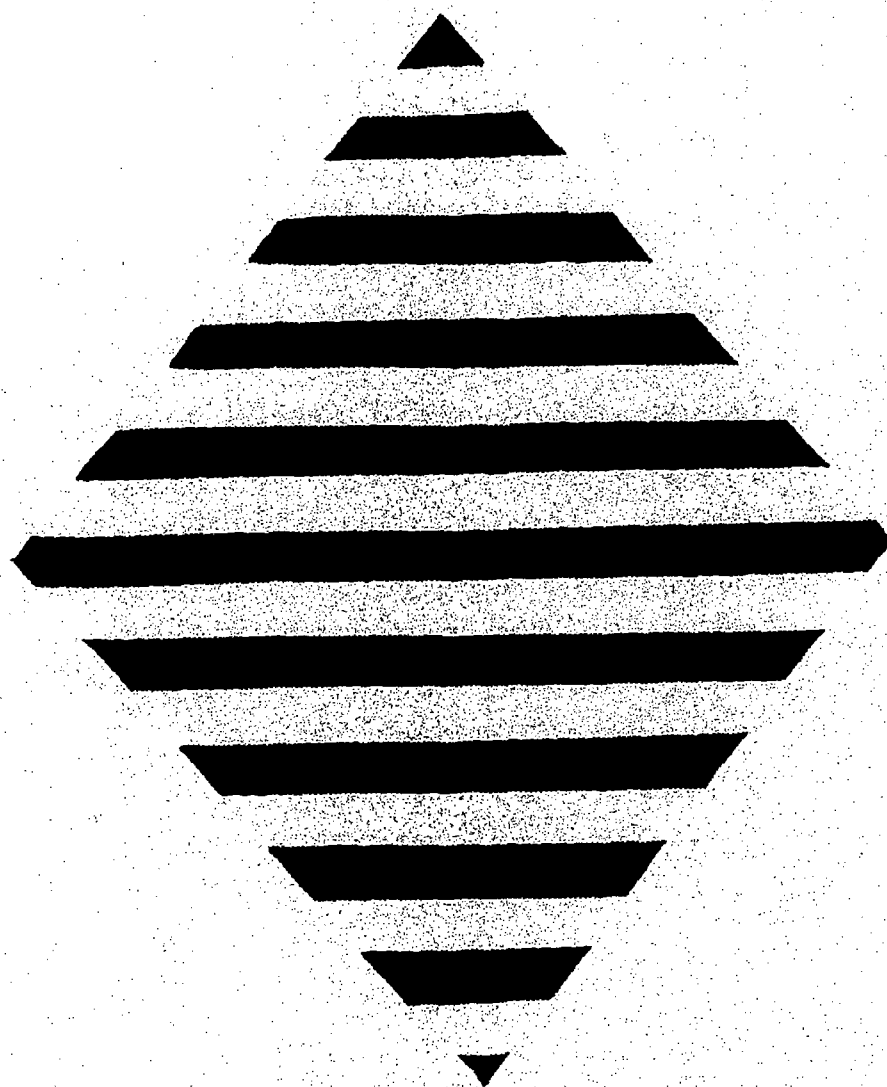
Our quotation for Titusville Area School District will include Identification, Packaging, Transportation, and Final Disposition of all materials and the appropriate Documentation to meet all Federal, State and Local Regulations.

Please feel free to call me at (800) 535-6650, with any questions you may have.

Sincerely,

Beverly Lorenzo
Customer Relations Associate

Enclosure
/dh



CHEMICAL ASSISTANCE,
INC.

CHEMICAL ASSISTANCE, INC.

has expanded facilities and operations
to better serve you

Our *new* address is:

**221 Dino Drive
Suite A
Ann Arbor, Michigan 48103**

Telephone number: (800) 535-6650
Facsimile number: (800) 535-0105



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

DESCRIPTION OF SERVICES

Chemical Assistance, Inc. will assist you in solving your chemical waste removal problems. We specialize in the packaging, removal, and final disposition of chemicals and waste materials by resale, reclamation, incineration, or blending for treatment. Laboratory chemicals will be accepted from conditionally exempt, small quantity generators and fully managed generators. Generators should submit Material Inventory lists for approval and a firm price quotation.

During the packing procedure the contents of each container will be segregated into one of the following categories:

1. Resale
2. Blend for Reclamation
3. Blend for Kiln Fire Incineration
4. Blend for Treatment

All materials reach the designated facility within 10 days of leaving the Generator.

Consulting Services

Hourly Rates:

| | |
|-------------|----------|
| Chemist | \$ 75.00 |
| Technician | \$ 55.00 |
| Secretarial | \$ 25.00 |

These rates are based on a per person per hour basis and charged to the nearest 1/2 hour with an 4 hour minimum. One hour of travel time will be added for each site visit required.

Fixed Total Job Price Quotations will be given as requested.



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

SERVICES

Our standard quotation will include the following:

Identification;

All materials will be identified and segregated by category prior to packaging and transportation.

Transportation;

All materials will be packaged and shipped in accordance with all Department of Transportation shipping regulations.
A licensed and insured transporter will be provided by Chemical Assistance, Inc.

Reclamation;

Final disposition of all materials will be through Reclamation, Beneficial Reuse, Resale or Treatment.
Only licensed and insured facilities will be used for waste materials.

Documentation;

All paperwork and shipping documentation will be prepared by Chemical Assistance, Inc. for your review.

Price;

The following cost guidelines can be used to estimate the total cost for Identification, Packaging, Transportation and Final Disposition of Materials:

| <u>Number of containers</u> | <u>Price per container</u> |
|-----------------------------|----------------------------|
| 0 - 500 | \$ 20.00 |
| 501 - 1000 | \$ 18.00 |
| above 1000 | \$ 15.00 |
| Reactives | \$ 50.00 |
| Unknowns | \$100.00 |

The minimum cost for containers of five gallons or larger is \$ 25.00.

Gas cylinders will be priced on an individual basis.

Fixed Total Job Price Quotation will be given as requested.



Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

SURPLEX SPECIALTY - RE, LIMITED.
PROVIDENCIALES
TURKS & CAICOS
B.W.I.

COMPANIES AFFORDING COVERAGES

COMPANY
LETTER

A SURPLEX SPECIALTY - RE, LIMITED

COMPANY
LETTER

B

COMPANY
LETTER

C

COMPANY
LETTER

D

COMPANY
LETTER

E

NAME AND ADDRESS OF INSURED

CHEMICAL ASSISTANCE
3237 LOCKRIDGE DRIVE
SUITE A
Ann Arbor, MI 48108

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

| COMPANY LETTER | TYPE OF INSURANCE | POLICY NUMBER | POLICY EXPIRATION DATE | LIMITS OF LIABILITY IN THOUSANDS (000) | | |
|-------------------|---|---------------|---------------------------|--|--------------------|---------------|
| | | | | | EACH OCCURRENCE | AGGREGATE |
| A | GENERAL LIABILITY <input checked="" type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> PREMISES—OPERATIONS <input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD <input type="checkbox"/> UNDERGROUND HAZARD <input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD <input type="checkbox"/> CONTRACTUAL INSURANCE <input type="checkbox"/> BROAD FORM PROPERTY DAMAGE <input type="checkbox"/> INDEP. CONTRACTORS <input type="checkbox"/> PERSONAL INJURY [X] E.I.L. | SSR-000123-R | 02-16-92 | BODILY INJURY | \$ | \$ |
| | PROPERTY DAMAGE | | | \$ | \$ | |
| | BODILY INJURY AND PROPERTY DAMAGE COMBINED | | | \$1,000 | \$1,000 | |
| | PERSONAL INJURY | | | | \$ | |
| A | AUTOMOBILE LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> OWNED <input type="checkbox"/> HIRED <input type="checkbox"/> NON-OWNED | | | BODILY INJURY (EACH PERSON) | \$ | |
| | BODILY INJURY (EACH ACCIDENT) | | | \$ | | |
| | PROPERTY DAMAGE | | | \$ | | |
| | BODILY INJURY AND PROPERTY DAMAGE COMBINED | | | | | |
| | EXCESS LIABILITY <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM | | | BODILY INJURY AND PROPERTY DAMAGE COMBINED | \$ | \$ |
| | WORKERS' COMPENSATION and EMPLOYERS' LIABILITY | | | STATUTORY | | |
| | OTHER | | | | \$ | EACH ACCIDENT |

DESCRIPTION OF OPERATIONS, LOCATIONS, VEHICLES

RETRO DATE : FEBRUARY 26, 1990
CLAIMS MADE POLICY.

Cancellation: Should any of the above described policies be cancelled before the expiration date, herein the issuing company
endeavor to mail 30 days written notice to the below named certificate holder. During the 30 day notice period,
there shall be no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

DATE ISSUED

APRIL 1, 1991

INFORMATION PAGE WORKERS COMPENSATION AND EMPLOYERS LIABILITY INSURANCE POLICY

FEIN NO.

38-2765489

RENEWAL OF: NEW

Policy Number
1712-00-063140

ALLSTATE
LINDA REYNOLDS
3001 PLYMOUTH RD.
ANN ARBOR, MI 48105

1. Insured and Mailing Address
CHEMICAL ASSISTANCE, INC.
3157 PACKARD RD., STE. A
ANN ARBOR, MI 48108

Insured is: CORPORATION

2. The policy period is from 01 11 91 to 01 11 92 12:01 A.M., standard time at the insured's mailing address.

3. Coverage:

A. Workers Compensation Insurance: Part One of the policy applies to the Workers Compensation Law of the states listed here: MICHIGAN

B. Employers Liability Insurance: Part Two of this policy applies to work in each state listed in item 3.A. The limits of our liability under Part Two are:
Bodily Injury by Accident \$100,000 each accident
Bodily Injury by Disease \$500,000 policy limit Bodily Injury by Disease \$100,000 each employee

C. Other States Insurance: Part Three of the policy applies to the states listed here.
ALL STATES EXCEPT STATES LISTED IN ITEM 3.A. AND NEVADA, NORTH DAKOTA, OHIO, WASHINGTON, WEST VIRGINIA AND WYOMING

4. Premium. The premium for this policy will be determined by our Manuals of Rules, Classifications, Rates and Rating Plans. All information required below is subject to verification and change by audit.

| Classifications | Code Number | Premium Basis Total Estimated Annual Remuneration | Rates Per \$100 of Remuneration | Estimated Annual Premium |
|-----------------|-------------|---|---------------------------------------|--------------------------------|
|-----------------|-------------|---|---------------------------------------|--------------------------------|

See Extension of Information Page

Minimum Premium: Workers Compensation
Total estimated premium

Premium will be billed: ANNUALLY

Deposit Premium

This policy includes at its effective date form WC0022 Extension of Information Page and all endorsements listed here:

Symbol Endorsements:

Other Endorsements: W3077.1 W6450.1 W6451 W6452

Issued by: EMPLOYERS INSURANCE OF WAUSAU A MUTUAL COMPANY

FORM 81-1/WC 00 00 00

Countersigned by

J. D. Schlan

Authorized Representative

INTER/INTRA STATE RBN 1565664A

(MI)

Issued 02-05-91

WC0020
(11-15-88)

WC 00 00 01A



Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

SURPLEX SPECIALTY - RE, LIMITED.
PROVIDENCIALES
TURKS & CAICOS
B.W.I.

COMPANIES AFFORDING COVERAGES

COMPANY
LETTER

A SURPLEX SPECIALTY - RE, LIMITED

COMPANY
LETTER

B

COMPANY
LETTER

C

COMPANY
LETTER

D

COMPANY
LETTER

E

NAME AND ADDRESS OF INSURED

CHEMICAL ASSISTANCE
3237 LOCKRIDGE DRIVE
SUITE A
Ann Arbor, MI 48108

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

| COMPANY LETTER | TYPE OF INSURANCE | POLICY NUMBER | POLICY EXPIRATION DATE | LIMITS OF LIABILITY IN THOUSANDS (\$000) | | |
|-------------------|--|---------------|---------------------------|--|--------------------|-----------|
| | | | | | EACH OCCURRENCE | AGGREGATE |
| A | GENERAL LIABILITY | SSR-000123-R | 02-16-92 | BODILY INJURY | \$ | \$ |
| | <input checked="" type="checkbox"/> COMPREHENSIVE FORM | | | PROPERTY DAMAGE | \$ | \$ |
| | <input type="checkbox"/> PREMISES-OPERATIONS | | | | | |
| | <input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD | | | | | |
| | <input type="checkbox"/> UNDERGROUND HAZARD | | | | | |
| A | <input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD | | | BODILY INJURY AND PROPERTY DAMAGE COMBINED | \$1,000 | \$1,000 |
| | <input type="checkbox"/> CONTRACTUAL INSURANCE | | | | | |
| | <input type="checkbox"/> BROAD FORM PROPERTY DAMAGE | | | | | |
| | <input type="checkbox"/> INDEP. CONTRACTORS | | | | | |
| | <input type="checkbox"/> PERSONAL INJURY | | | | | |
| A | <input checked="" type="checkbox"/> E.I.L. | | | PERSONAL INJURY | | \$ |
| | AUTOMOBILE LIABILITY | | | | | |
| | <input type="checkbox"/> COMPREHENSIVE FORM | | | BODILY INJURY (EACH PERSON) | \$ | |
| | <input type="checkbox"/> OWNED | | | BODILY INJURY (EACH ACCIDENT) | \$ | |
| | <input type="checkbox"/> HIRED | | | PROPERTY DAMAGE | \$ | |
| | <input type="checkbox"/> NON-OWNED | | | BODILY INJURY AND PROPERTY DAMAGE COMBINED | | |
| | EXCESS LIABILITY | | | | | |
| | <input type="checkbox"/> UMBRELLA FORM | | | BODILY INJURY AND PROPERTY DAMAGE COMBINED | \$ | \$ |
| | <input type="checkbox"/> OTHER THAN UMBRELLA FORM | | | | | |
| | WORKERS' COMPENSATION and EMPLOYERS' LIABILITY | | | STATUTORY | | |
| | OTHER | | | | | |
| | | | | | | |

DESCRIPTION OF OPERATIONS, LOCATIONS, VEHICLES

RETRO DATE : FEBRUARY 26, 1990
CLAIMS MADE POLICY.

Cancellation: Should any of the above described policies be canceled before the expiration date, interest in the issuing company endeavor to mail 30 days written notice to the below named certificate holder. Such failure to mail such notice shall constitute no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

APR 11 1991

DATE ISSUED



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

GENERATOR ACKNOWLEDGEMENT AND CONSENT

As a representative of _____,

I (do / do not) grant permission for our waste chemicals to be mixed by Chemical Assistance, Inc. for the purpose of consolidation.

In addition, I (do / do not) give Chemical Assistance, Inc. permission to declare any of the chemicals a product for the purpose of resale or beneficial reuse through Environmental Recycling, Inc.

Authorized Representative

Title _____ Date _____



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

REFERENCES

CONTACT PERSON

Atlanta/Fulton County Schools
786 Cleveland Avenue S.W.
Atlanta, Georgia 30315 Lowell Jacks (404)768-3600

Wayne County Board of Education
P.O. Box 70
Wayne, West Virginia 25570-0070 Jim Hale (304)272-5116

Marion County School District
200 Gaston Avenue
Fairmont, West Virginia 26554-2739 Diane Furman (304)367-2100

Case Western Reserve University
Administrative Services
213 Quail Building
Cleveland, Ohio 44106 Richard Dell (216)368-5864

Alderson-Broadus College - Phillipi, West Virginia
Ann Arbor Public Schools - Ann Arbor, Michigan
Auburn University - Auburn University, Alabama
Birmingham Schools - Birmingham, Michigan
Breneau Woman's College - Gainesville, Georgia
Cedarville College - Cedarville, Ohio
Clay County School District - Manchester, Kentucky
DeKalb County Schools - Atlanta, Georgia
Dundee Community Schools - Dundee, Michigan
East Carolina State University - Greenville, North Carolina
East Lansing Public Schools - East Lansing, Michigan
Flint Community Schools - Flint, Michigan
Harrison County School District - Clarksburg, West Virginia
Jackson-Madison Schools - Jackson, Tennessee
Mott Community College - Flint, Michigan
Oakland Community College - Auburn Hills, Michigan
Savannah State College - Savannah, Georgia
Todd County School District - Elkton, Kentucky
Winston-Salem University - Winston-Salem, North Carolina
Wood County School District - Parkersburg, West Virginia



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

DISPOSAL FACILITIES

Standard Regulated Materials

- | | |
|---|--|
| 1. Battery Disposal Tech. NYD 000 632 372 4255 Research Parkway Clarence, New York 14031 | 2. CyanoKem MID 098 011 992 12381 Schaefer Avenue Detroit, Michigan 48227 |
| 3. Chem Met Services, Inc. MID 096 963 194 18550 Allen Road Wyandotte, MI 48192 | 4. Edwards Oil Services MID 088 754 668 530 South Rouge 48217 Detroit, MI 48217 |
| 5. Michigan Disposal, Inc. MID 000 724 831 49350 Service Drive Belleville, Michigan 48111 | 6. Michigan Recovery Systems MID 060 975 844 36345 Van Born Road Romulus, Michigan 48174 |
| 7. Wayne Disposal, Inc. MID 048 090 633 49350 Service Drive Belleville, Michigan 48111 | 8. OSCO, Inc. TND 980 515 779 202 Hill Street Columbia, Tennessee 38402 |
| 9. Environmental Network, Inc. OHD 986 985 661 63 Dixie Highway Rossford, Ohio 43460 | 10. Petro-Chem Processing, Inc. MID 980615298 515 Lycaste Street Detroit, MI 48214 |

PCB Materials

- | | |
|---|--|
| 1. Aptus Environmental Services 21750 Cedar Avenue P.O. Box 550 Lakeville, MN 55044 | 2. PPM Inc. 10 Central Avenue Kansas City, Kansas 66118 |
| 3. USPCI, Inc. 2000 Classen Center Suite 400 South Oklahoma City, Oklahoma 73106 | |

NRC Regulated Materials

- | | |
|---|--|
| 1. Chem-Nuclear System, Inc. 220 Stoneridge Drive Columbia, South Carolina 29210 | 2. WasteChem 454 S. Anderson Road Rock Hill, South Carolina 29730 |
|---|--|



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

GENERAL TRANSPORTATION

- | | |
|---|--|
| 1. Dart Services, Inc. OHD 009 865 825 61 Railroad Street P.O. Box 89 Canfield, Ohio 44406 | 2. Buffalo Fuel Corp. NYD 051 809 952 2445 Allen Avenue P.O. Box 1038 Niagara Falls, New York 14303 |
| 3. Michigan Recovery Systems MID 060 975 844 36345 Van Born Road Romulus, Michigan 48174 | 4. Chemical Waste Management ILD 000 672 121 3001 Butterfield Road Oak Brook, Illinois 60521 |
| 5. Cousins Waste Control OHD 068 081 595 1801 Matzinger Road Toledo, Ohio 43612 | 6. Environmental Network OHD 986 985 661 63 Dixie Highway Rossford, Ohio 43460 |
| 7. OSCO, Inc. TND 980 515 779 P.O. Box 1203 202 Hill Street Columbia, Tennessee 38402 | 8. Wolverine Disposal MID 086148202 P.O. Box 823 Willow Run Airport Ypsilanti, MI 48198 |

**HAZARDOUS WASTE
MANAGEMENT MANUAL**

Regulations for Hazardous Waste Generators

Conditionally Exempt Small Quantity Generator Regulations

1. Evaluate your waste and keep records of your waste evaluations.
2. Never collect more than 100 kg. per month.
3. Never accumulate over 1000 kg. of hazardous waste at your site.
4. Hazardous waste facility is not required, but no hazardous waste may go into a solid waste landfill.
5. Use the correct EPA waste code and U.S. Department of Transportation (DOT) shipping name and number.

Small Quantity Generator Regulations

1. Evaluate your waste and keep records of your waste evaluations.
2. Never accumulate over 1000 kg. of hazardous waste at your site, and never exceed the 90 day time limits for waste accumulation.
3. Recycle materials or ship wastes to a licensed hazardous waste facility to treat or incinerate.
4. Use the correct EPA waste code and U.S. DOT shipping name and number.
5. Package and label hazardous wastes properly (U.S. DOT and hazardous waste regulations).
6. Use Uniform Hazardous Waste Manifest (shipping paper),
7. Obtain a federal EPA generator identification number.
8. Use a transporter who has an EPA identification number.
9. Use proper containers and tanks for accumulated waste.
10. Maintain waste records for three years.
11. Meet emergency preparedness requirements.

Fully Managed Generator Regulations

1. Evaluate your waste and keep records of your waste evaluations.
2. Remove accumulated wastes over 1000 kg. within 90 days.
3. Recycle materials or ship wastes to a licensed hazardous waste facility to treat or incinerate.
4. Use the correct EPA waste code and U.S. DOT shipping name and number.
5. Package and label hazardous wastes properly (U.S. DOT and hazardous waste regulations).
6. Use Uniform Hazardous Waste Manifest (shipping Paper),
7. Obtain a federal EPA generator identification number.
8. Use licensed transporters to ship the wastes.
9. Provide secondary containment for accumulated liquid hazardous waste.
10. Maintain waste records for three years.
11. Submit biennial and exception reports.
12. Prepare contingency and emergency preparedness plan.
13. Provide training for employees.

HAZARDOUS WASTE MANAGEMENT

Summary: Responsibility must be assigned for each step in hazardous waste management, in order to assure that the organization is in compliance with the laws. Recommendations are given for a planning process to assure that responsibilities are assigned.

Planning Considerations: The following points should be kept in mind while developing a hazardous waste management plan for your organization:

- * Plans only "work" when they are developed in conjunction with those who are required to implement them. It is important to consult with classroom instructors as well as administrators and non-teaching personnel.
- * Often the best solution to a hazardous waste management problem is to eliminate the generation of the hazardous waste at its source. By discussing changes in experiments or processes generating the waste, often a difficult hazardous waste management problem can be eliminated.
- * The "Checklist of Steps and Assignments" on the following pages, when completed and officially adopted, can be the nucleus of your Hazardous Waste Management Plan. Explanatory material, such as copies of this planning guidebook, may also be included.

1. Determine steps for the Hazardous Waste Management Plan.

An individual within the Organization should be authorized to develop a plan to assure compliance with hazardous waste regulations and management of wastes in an environmentally sound manner. To help you in this task, you may wish to seek the advice of a professional consultant; Chemical Assistance, Inc., at (800) 535-6650.

The plan should show the necessary management steps related to several major phases of small quantity hazardous waste management:

- * Waste evaluation and determination of generator status
- * Meeting waste management requirements
- * Selecting Chemical Assistance, Inc. for your recycling, treatment, and transportation services
- * Handling and accumulating hazardous waste securely
- * Shipping wastes and keeping records.

2. Assign responsibility for various functions in the plan.

The "Checklist of Steps and Assignments" on the following pages outlines management steps which should be assigned within each major phase of the plan. Accomplishing these steps will assure that your organization has made a good-faith effort in small quantity hazardous waste management.

Likely designees to take responsibility for various steps on the checklist would be:

- * Member of Administrative staff (e.g. Business Manager)
- * School Principal
- * Science Department Head
- * Industrial Arts Department Head
- * Fine Arts Department Head
- * Maintenance Supervisor

Use job titles rather than individuals' names, when assigning responsibilities within the plan. Do not depend solely on certain key individuals currently within the organization to handle the whole program, as they may leave in the future.

In most cases each separate location must be considered as a separate site of waste generation, in accordance with the hazardous waste regulations. The only exception would be in a case where two or more buildings occupy the same site, not separated from each other by public roads. Therefore it will be necessary to consider where the hazardous waste management functions can be administered most effectively.

3. Include an authorizing letter from an Administrative Official.

For distribution purposes, it is useful to accompany your Hazardous Waste Management Plan with an authorizing letter from an Administrative Official. This authorizing letter is not required by the regulations, but is useful in order to establish the validity of the plan. A sample letter is provided on the next page. The letter should indicate:

- * That this is the authorized hazardous waste management plan for the organization and the scope of coverage (i.e. a single location or the district);
- * The regulatory requirements which are being met by the plan;
- * Persons to contact for further information about the plan.

4. Consult and list related location or district plans.

When developing your Hazardous Waste Management Plan, consult other plans which may already exist in your organization, relating to personal safety and the handling of hazardous or polluting materials. Make sure that your Hazardous Waste Management Plan will be compatible with existing plans, and that all plans are consistent.

Other plans to be consulted might include:

- * Hazard Communication plan (Right-to-Know)
- * Spill control plan
- * Emergency or evacuation plan
- * Asbestos removal plan
- * Underground storage tank (UST) testing plan.

Within your Hazardous Waste Management Plan, list any related plans which exist in your organization and indicate where they may be found by an employee or inspector.

SAMPLE AUTHORIZING LETTER TO ACCOMPANY PLAN

Date: _____

To: All Employees

Subject: Hazardous Waste Management Plan for (Organization Name)

This document is the Hazardous Waste Management Plan for (Organization name). The policies and responsibilities stated in this plan are intended to ensure that (Organization name) manages its hazardous wastes in a legal and environmentally sound manner. The plan states policies and assignments for all steps required in legally managing hazardous wastes. This plan represents one aspect of the commitment of (Organization name) to the safe use of chemicals and hazardous materials.

All personnel should be aware of their responsibilities within this Hazardous Waste Management Plan. Personnel may generate hazardous wastes at many possible locations, including:

- * Science Laboratories
- * Art and Vocational classes
- * Transportation Services
- * Maintenance and Custodial Services.

For questions regarding implementation of this plan contact (job title) at (location or phone number).

(Signature of organization official)

HOW CAN ORGANIZATIONS REDUCE WASTES AND CUT COSTS?

Summary: Management of hazardous wastes as required by law can add costs. Recommendations are given for ways to cut costs through waste reduction, Material recycling, and reducing costs for transportation. These suggestions are not mandatory.

WASTE REDUCTION

Product substitution

In many situations, hazardous waste results from the use of hazardous substances during research, instruction and/or maintenance. Sometimes non-hazardous materials may be substituted.

For example:

Water-based paints may be used instead of solvent-based paints. Alternative laboratory experiments can be selected, which still demonstrate a given principle but generate no hazardous waste, generate a smaller amount, or generate a waste that is more easily managed. For example, the disposal of chlorinated solvents is generally much more difficult and expensive than the disposal of non-chlorinated solvents. Non-chlorinated solvents can be substituted for chlorinated solvents, saving on disposal costs.

Modification of laboratory procedures

In many instances, the quantity of hazardous waste from laboratory experiments can be reduced by performing them on a smaller scale (i.e. micro-scale or miniaturizations). Experiments can also be performed by demonstration to reduce hazardous waste generation.

In some cases laboratory experiments may be designed to include, as part of the learning experience, certain steps which will convert hazardous intermediate products into non-hazardous or less hazardous end products.

Waste collection and segregation practices

Hazardous wastes should be kept segregated from each other, in closed containers which are in good condition and clearly labeled. Unnecessary mixing of different wastes significantly increases the cost of waste evaluation. Usually waste mixtures cannot be managed through the less costly options such as recycling, or reclamation. Avoiding spills on your premises will help to minimize the amount of hazardous waste that you must manage. If a listed hazardous waste is mixed with other waste material or with the soil where it is spilled, the entire resulting mixture must be managed as a hazardous waste.

- * Handle hazardous wastes carefully, avoiding spills and cleanup.
- * Keep each type of hazardous waste in its own separate container.
- * Place waste containers on impervious surfaces.
- * Use impervious berms and dikes around waste accumulation areas.
- * Minimize the movement of hazardous waste containers.
- * Triple-rinse empty pesticide containers and place in regular trash.
- * Inform employees of hazards and disposal requirements.
- * Arrange weekly inspections of containers and accumulation area.

RECOVERY, REUSE, AND RECYCLING OPTIONS

Waste oil reclamation and recycling

Used motor oil (crankcase oil) from school buses, vans, automobiles, or trucks can often be recycled and reused. Haulers pick up used oil from pre-arranged collection points, sometimes paying a small per-gallon fee, and sell it to treatment and reclaim facilities. After treatment to remove contaminants, these facilities in turn use it or sell it for fuel, motor oil, or other uses. If your Organization's vehicle maintenance operation generates a supply of waste oil available on a regular basis, a licensed hauler may be willing to add your site to his pickup run. Alternatively, you may carry your used oil to a collection point to obtain free disposal.

AVOIDING EXCESS CHEMICALS -- CONTROLLING FUTURE WASTE

The inventory process may reveal that many storage areas contain excess laboratory chemicals. The accumulation is often the result of ordering procedures used by Researchers, Instructors and/or Organizations. Large quantity annual orders are often looked upon as a convenient way to receive a lower per unit cost, avoid frequent buying, and ensure that staff members do not run out of supplies.

Chemical accumulation in excess of short term needs increases the organization's general liability for health and safety risks, as well as the costs for disposal. Chemicals often deteriorate with time and when they must be removed, the disposal costs may be 20 to 50 times the original purchase price.

Ways to avoid excess chemicals and control future waste include:

- * Purchase laboratory chemicals in small containers.
- * Purchase chemicals in amounts that reflect short term use.
- * Remove excess inventory before it becomes unidentified which requires expensive laboratory analysis prior to disposal.
- * Date chemicals upon receipt and note expiration dates (3 years - 6 months), then use or discard before expiration dates. Deterioration of chemicals often increases handling hazards and disposal costs.
- * Maintain a list of chemicals being stored.
- * Purchase only chemicals currently in use.
- * If new laboratory procedures are adopted, allow adequate phase-in periods to use up old chemical supplies.

REDUCING COSTS FOR TRANSPORTATION

On a milk run pickup, small quantities of hazardous waste from several different generators are collected in separate containers on a single truck. Instead of sending a special truck to make one pickup, Chemical Assistance, Inc., arranges a schedule to make a series of stops on the same day. Milk run pickups can sometimes reduce costs by 20%. Chemical Assistance, Inc., can often link two or more organizations in your geographical area. For maximum feasibility, the locations should be in close proximity to each other. Each generator maintains a separate manifest for the hazardous waste loaded on the truck, just as if it were a separate pickup. At the treatment or disposal facility, individual fingerprinting (quick tests) of the waste containers may also be required.

Major Hazardous Waste Options

| Methods | Description of Methods | Suitable Types of Wastes | Disadvantages and Limitations | Advantages and Benefits |
|---|--|---|--|--|
| Waste Reduction | <ul style="list-style-type: none"> • Use smaller quantities • Substitute other processes and materials | <ul style="list-style-type: none"> • Most Types | <ul style="list-style-type: none"> • Changes in processes or production might be required • May increase short term costs | <ul style="list-style-type: none"> • Reduces waste • Conserves resources • Saves money in long term |
| Environmental Recycling and Recovery | <ul style="list-style-type: none"> • Materials that can be reused are separated from residual wastes • Chemical or physical methods • Use of Environmental Recycling, Inc. | <ul style="list-style-type: none"> • Many solvents • Some petroleum products • Some metals and metal sludges • Most Reagent Grade Chemicals | <ul style="list-style-type: none"> • Requires segregation and collection • Needs quality controls • Needs information exchange | <ul style="list-style-type: none"> • Saves money in short term • Conserves resources • Reduces waste • Reduced Regulatory Requirements |
| Kiln Fire Incineration | <ul style="list-style-type: none"> • Controlled combustion at very high temperature | <ul style="list-style-type: none"> • Almost all liquid, semi-solid, and solid combustible wastes | <ul style="list-style-type: none"> • Complex special technology • Relatively expensive • High energy requirement • Potential air pollution | <ul style="list-style-type: none"> • Reduces volume • Most effective destruction method • Permanent |
| Chemical, Biological, and Physical Treatment | <ul style="list-style-type: none"> • Chemical or biological methods render wastes less hazardous • Filtration, separation, absorption of liquids • Solidification and encapsulation of solids | <ul style="list-style-type: none"> • Mainly specialized liquid wastes: metal, cyanides, acid and alkaline wastes • Some dilute organic and petrochemical wastes | <ul style="list-style-type: none"> • Limited applicability • Separate method needed for each waste • May produce other wastes • May produce bulky inert wastes | <ul style="list-style-type: none"> • Effective • Simple technologies • Usually permanent • Low energy requirement • May reduce volume |

Hazardous Waste Management Plan: Checklist of Steps and Assignments

School/District Name _____ Date Adopted/Revised _____

| Management Steps | Function of Dist./Sch./ Both | Person/Group Responsible | Target Date |
|---|---------------------------------|-----------------------------|-------------|
| 1. Waste evaluation, generator status | | | |
| Tour building(s) and inventory wastes | | | |
| Determine generator status (amt./mo.) | | | |
| Consider waste reduction options | | | |
| Call Chemical Assistance, Inc. at (800) 535-6650 | | | |
| 2. Waste management requirements | | | |
| Designate emergency coordinator | | | |
| Post emergency #'s | | | |
| 3. Secure handling and accumulation | | | |
| Designate secure waste accumulation area(s) | | | |
| Instruct personnel on secure waste handling and storage proceedures | | | |
| Check accumulation area(s) regularly | | | |
| Avoid excess waste accumulation, perform maintenance of area | | | |
| Do Not exceed Federal Time- Frame for removal | | | |
| 4. Ship wastes and keep records | | | |
| Issue purchase orders for removal | | | |
| Have removal done by: Chemical Assistance, Inc. at (800) 535-6650 | | | |
| Keep file of waste evaluation (3 years) | | | |
| Keep file of manifests, shipping records (3 years) | | | |

DATE: 07/03/91

F A X T R A N S M I T T A L F O R M

(NAME)

FAX Number: (814)827-7761

TO THE ATTENTION OF: BEVERLY LORENZO

221 Dino Drive, Suite A Ann Arbor, Michigan 48103

SCHOOL/COMPANY: _____ CHEMICAL ASSISTANCE

FAX NUMBER: 1-800-535-0105

TOTAL PAGES 2 (includes this cover page)

Please forward this packet immediately. THANK YOU

NOTES :



TITUSVILLE AREA SCHOOL DISTRICT

221 NORTH WASHINGTON STREET • TITUSVILLE, PENNSYLVANIA 16354-1785

PHONE: (814) 827-2715

RICHARD CARR
SUPERINTENDENT OF SCHOOLS

KENNETH E. WINGER
ASSISTANT SUPERINTENDENT

July 3, 1991

Chemical Assistance
221 Dino Drive
Suite A
Ann Arbor, Michigan 48103

ATTENTION: BEVERLY LORENZO

Dear Ms. Lorenzo,

Titusville Area School District has twenty-seven (17) containers in all.

| <u>SIZE</u> | <u>LIQUID</u> | <u>DRY</u> |
|-------------------------|---------------|--------------|
| ONE GALLON SIZE | 7 LIQUID | 1 DRY POWDER |
| ONE PINT SIZE | 6 LIQUID | 6 DRY POWDER |
| ONE-HALF PINT & SMALLER | 7 LIQUID | |

Please fax me a quote as soon as possible. (Fax Number - 1-814-827-7761)

Thanks!

Sincerely,

TITUSVILLE AREA SCHOOL DISTRICT

RICHARD B. TANNER
DIRECTOR of BUILDING and GROUNDS



Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

July 3, 1991

Mr. Richard Tanner
Director of Building and Grounds
Titusville Area School District
221 North Washington Street
Titusville, Pennsylvania 16354

Dear Mr. Tanner;

With regard to the inventory list received July 3, 1991; Chemical Assistance, Inc. is pleased to provide a quotation of **\$2,700.00 (Two Thousand Seven Hundred Dollars)**.

This price includes the removal and final disposition of all materials in addition to the following services:

Identification;

All materials are identified and segregated by category prior to packaging and transportation.

Documentation;

All paperwork and shipping documentation will be prepared by Chemical Assistance, Inc. for your review.

Reclamation;

Final disposition of all materials will be through Reclamation, Beneficial Reuse, Resale or disposal. Only licensed and authorized facilities are used for waste materials.

Transportation;

All materials are packaged and shipped in accordance with all Department of Transportation shipping regulations.

All quotations are valid for 30 days with a payment term of net 30 days.

Thank-you for allowing **Chemical Assistance, Inc.** the opportunity to provide this price quotation. If you have any questions regarding this matter, please call us at 1-800-535-6650.

Sincerely,

Lisa M. Fookes
Customer Relations Manager

LMF/ll

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible pencil, or in carbon and retained by the Agent. — **ORIGINAL—NON NEGOTIABLE**

Shipper's No. 10012

Carrier's No. _____

NAME OF CARRIER Chemical Assistance, Inc.

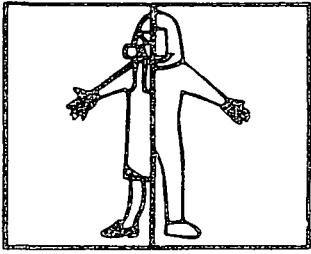
RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

AT _____ FROM _____ Date August 18, 1991

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shippers and accepted for himself and his assigns.

| | | | |
|---|-----------------|--|-------------------------|
| CONSIGNEE TO <u>Environmental Network</u> | | EXEMPTION # _____ | SEAL # _____ |
| ADDRESS <u>63 Dixie Highway</u> | | ROUTE _____ | FINAL DESTINATION _____ |
| CITY <u>Rosford</u> | STATE <u>OH</u> | ZIP <u>43460</u> | |
| EMERGENCY CONTACT: <u>(800) 535-6650</u> | | CAR OR VEHICLE LICENSE # _____ NO. _____ | |

| NO. & TYPES OF PKGS. | HAZ. MAT. | PROPER DOT SHIPPING NAME AS SHOWN IN 172.101 49CFR (See back for emergency response info) | CONSTITUENTS WHEN N.O.S SHIPPING NAME USED IN PARENTHESES | HAZARD CLASS UN/NA NUMBER(S) | "POISON" & "INH. HAZARD" IF LC50. NAMES OF HAZARDOUS SUBSTANCE(S) IF "RO" | *WEIGHT (SUBJECT TO CORRECTION) | "RO" VALUE & EMERGENCY RESP. GUIDE # |
|----------------------|---------------------------------------|---|---|------------------------------|---|---------------------------------|---|
| 1 | <input checked="" type="checkbox"/> A | Flammable Liquid, NOS | (Lab Pack Guide 27) | Flammable Liquid UN 1993 | None | 20 pounds | <input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG # |
| 1 | <input checked="" type="checkbox"/> B | Corrosive Liquid, NOS | (Lab Pack Guide 60) | Corrosive Liquid UN 1780 | None | 20 pounds | <input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG # |
| 1 | <input checked="" type="checkbox"/> C | Oxidizer Material, NOS | (Lab Pack Guide 25) | Oxidizer UN 1479 | None | 10 pounds | <input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG # |
| 1 | <input checked="" type="checkbox"/> D | Non-Regulated Materials | (Lab Pack) | None | None | 10 pounds | <input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG # |

| | | | | |
|--|--|---|--|---|
| WHERE CHECKED-USE THE PROTECTIVE EQUIPMENT AND CLOTHING IF EXPOSED TO THIS MATERIAL IN USE OR IN AN EMERGENCY | <input type="checkbox"/> Hard Hat <input type="checkbox"/> Safety Glasses <input type="checkbox"/> Safety Goggles <input type="checkbox"/> Full Face Shield <input type="checkbox"/> Protective Gloves <input type="checkbox"/> Splash Apron <input type="checkbox"/> Protective Boots |  | <input type="checkbox"/> Respiratory Protection <input type="checkbox"/> Air-purifying Respirator Type _____ <input type="checkbox"/> Fully Encapsulated Suit <input type="checkbox"/> Atmosphere-Supplying Respirator Type _____ | WHEN "RO" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR. |
|--|--|---|--|---|

| | | | | | | | |
|--|--|--|---|---|---|---|--|
| SPECIAL MARKINGS OR INSTRUCTIONS <u>Unknown Analysis</u> | SHIPPER'S CERTIFICATION This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature: <u>[Signature]</u> Title: <u>Director</u> | PLACARDS PROVIDED OR AFFIXED <u>NA</u> | | | | | |
| NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding <u>received 8/31/91</u> | | | | | | | |
| Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of consignor) _____ | If charges are to be prepaid write or stamp here "To be Prepaid." Received \$ _____ to apply in prepayment of the charges for property described hereon. Agent or Cashier _____ Per _____ (The signature here acknowledges only the amount prepaid) | Charges advanced: \$ _____ C.O.D. charge to be paid by Shipper <input type="checkbox"/> Consignee <input type="checkbox"/> | SHIPPER'S CHECK LIST <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td><input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE</td> <td><input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS</td> </tr> <tr> <td><input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES</td> <td><input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING</td> </tr> </table> | <input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE | <input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS | <input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES | <input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING |
| <input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE | <input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS | | | | | | |
| <input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES | <input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING | | | | | | |
| EMERGENCY RESPONSE INFORMATION (ERG) IN VEHICLE | | | | | | | |

SHIPPER Titusville Area School District
 ADDRESS 221 N. Washington Street
 CITY Titusville STATE PA
 TELEPHONE (814) 827-2715 PER _____
 PERMANENT POST OFFICE ADDRESS OF SHIPPER _____ SIGNATURE _____

AGENT Mr. Richard B. Tanner
 PER [Signature]
 NUMBER 8/19/91

2

 Transportation Skills Program™
 243 West Main Street
 Kutztown, Pennsylvania 19530
 Copyright © 1990



CHEMICAL CONSULTING NETWORK, INC.

230 Collingwood • Suite 160 • Ann Arbor, Michigan 48103 • (800) 535-0107

February 3, 1994

Mr. Dick Tanner
Buildings & Grounds
Titusville Area School District
221 N. Washington Street
Titusville, PA 16354

Dear Mr. Tanner:

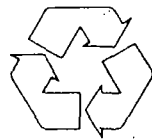
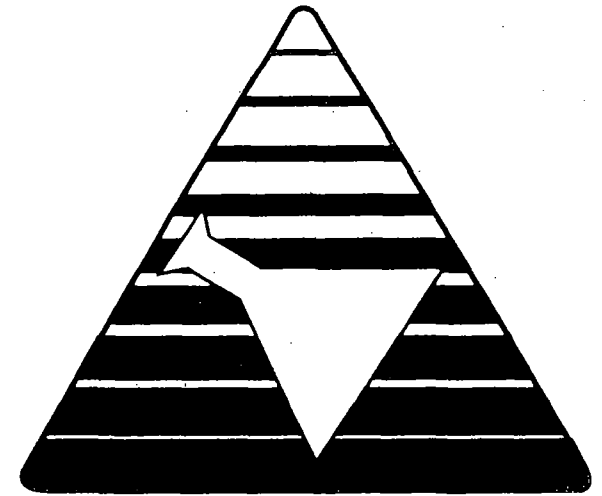
Thank you for taking the time to speak with me today. I appreciate you allowing CCN to list your school as a business reference in our current literature. I hope we can be of assistance to you in the future! Enclosed is a copy of our updated literature which includes a Rolodex card to make contacting us as easy as possible.

If you have any questions or need additional information, please call me at (800) 535-0107.

Sincerely,

Jodi L. Smith
Customer Relations Manager

Enclosure



Printed on Recycled Paper

CHEMICAL CONSULTING NETWORK, INC.

CHEMICAL CONSULTING NETWORK, INC.

Our team of experts can provide you with a comprehensive waste management program.

We are a full service company offering assistance in:

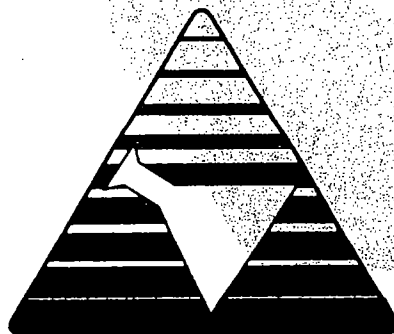
- Environmental Consulting
- HAZMAT Employee Training
- Chemical Analysis and Waste Disposal

CHEMICAL CONSULTING NETWORK, INC.

CHEMICAL CONSULTING NETWORK, INC.

is an association of professionals dedicated to serving the needs of academic institutions in the area of regulatory compliance and hazardous waste management. We offer a complete line of services to develop a waste management program customized to fit your individual needs. Through our network of services, we provide you with reliable, efficient, and environmentally safe solutions to your chemical waste concerns.

We are a company that cares . . . about you and about our environment.



COMPLETE AND CUSTOMIZED SERVICE

Chemical Consulting Network, Inc. provides reliable, responsible, and complete waste management service. Our personnel and facilities are fully equipped with the expertise and resources to effectively meet your hazardous waste management needs.

Our network of services includes:

Consulting Services

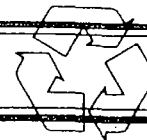
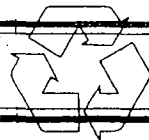
- Regulatory Compliance Programs
- Laboratory Assessments
- Waste Management Inservices
- Employee Safety Training

Analytical Services

- Hazardous Waste Analysis
- Inorganic Analysis
- Organic Analysis
- Field Sampling

Disposal Services

- Lab Pack Program



Consulting Services

With the increased complexity of federal and state regulations, it is easy to see why some generators feel overwhelmed by what is required of them.

That is one reason **Chemical Consulting Network, Inc.** has programs available to address your unique waste management concerns. We can assist you with compliance in all areas. Our consultants can identify problem areas in your laboratory; from your storage areas to your ventilation operation and safety program, we are here to help you identify "trouble spots" and suggest methods to improve and ensure compliance.

Our consulting services include:

- Regulatory Compliance/EPA Permitting
- Internal Site Audits
- Laboratory Assessments
- Inventory Control Programs
- Waste Minimization Techniques
- Waste Management Inservices
- HAZMAT Training
- OSHA and EPA Compliance
- Right-to-Know Training
- Safety Training

With our education and training programs, the needs of both the environment and your institution can be met . . . and both can flourish.

Analytical Services

Using the most advanced technologies, **Chemical Consulting Network, Inc.** laboratories offer environmental analytical services. CCN utilizes experienced personnel and automated equipment, as well as on-site field support.

Hazardous Waste Analysis

CCN is able to determine characteristics of hazardous waste using TCLP extraction, ZHE, acid and neutral leachate, and ultrasonic extractions. These services provide waste characterizations necessary for disposal facility acceptance.

Inorganic Analysis

Our labs can perform analysis of metallic species from Aluminum to Zinc. Using various techniques in the absorption and emission of your samples such as: Ion chromatography, atomic absorption, and ICP. CCN has inorganic capabilities in:

- Metals Analysis
- RCRA Metals
- EPA Priority Metals
- TCLP Metals

Organic Analysis

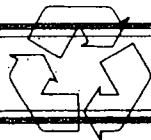
From bulk analysis of industrial waste solvents by GC to ultra trace analysis through GCMS, CCN handles your analytical needs using the most precise and accurate instrumentation available. Our organic capabilities include:

- Air Contaminant Assessment
- Soil Testing
- Ground Water Analysis
- Solvent Scan
- Semivolatiles: Acid/Base-Neutral Analysis

Field Sampling

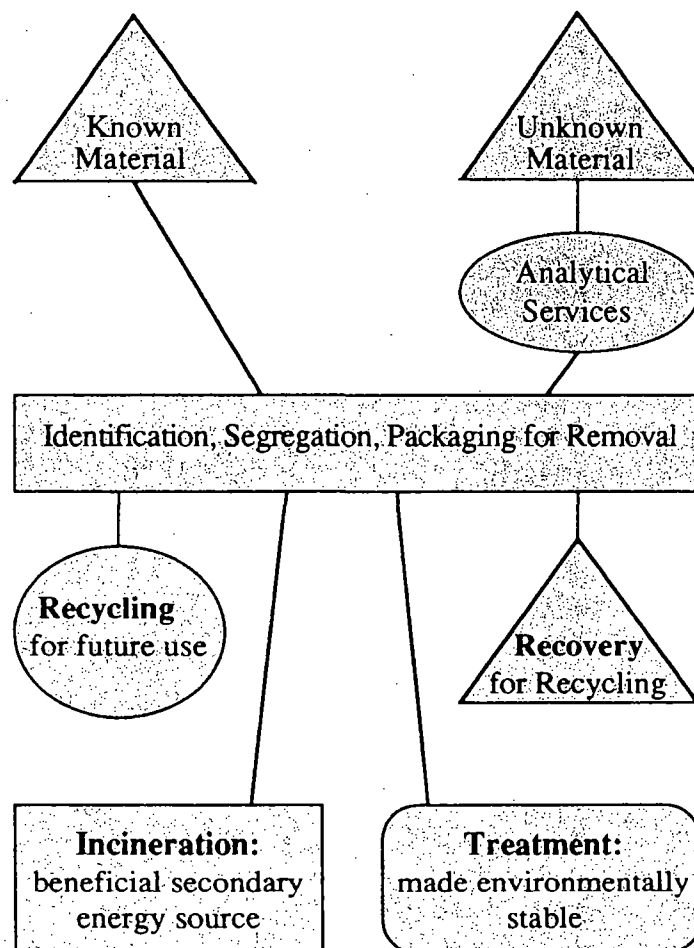
CCN can provide quality personnel to provide you with excellent on-site support for the following services:

- Air Quality Monitoring
- Exposure Detection
- Ground Water Monitoring
- Wastewater Monitoring
- Hazardous Waste Sampling
- Soil Sampling

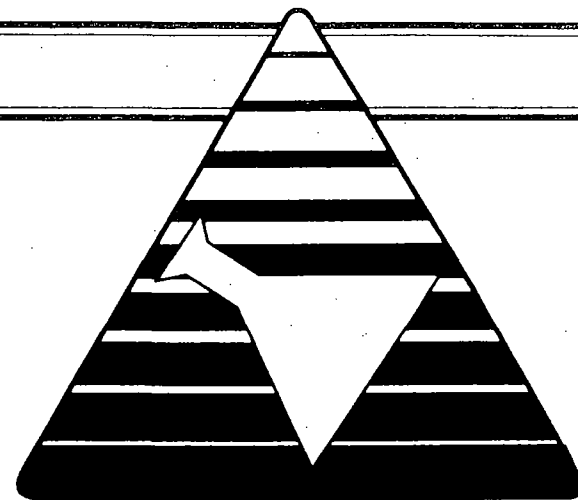


Disposal Services

Chemical Consulting Network, Inc. offers a full complement of environmentally sound, cost-effective, and safe removal options.



By utilizing these removal options, and working in partnership with our customers, CCN is meeting the challenge of providing solutions to waste manage-



CHEMICAL CONSULTING NETWORK, INC.

We offer years of successful waste management experience. From the highly trained environmental chemists to the friendly and knowledgeable support staff, we represent a genuine commitment to quality service.

For additional information regarding the quality services provided by the **Chemical Consulting Network, Inc.**, call us at:

(800) 535-0107

or write

P.O. Box 19855

Kalamazoo, Michigan 49019-0855

**Chemical Consulting
Network, Inc.**

CHEMICAL CONSULTING NETWORK, INC.



P.O. Box 19855

Kalamazoo, MI 49019-0855

Telephone: (800) 535-0107

Facsimile: (800) 535-0105